



# Facility Security Level Determinations for Federal Facilities

An Interagency Security Committee Standard

2008



Homeland  
Security

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**Cover Photo:** This photo of the Oklahoma City Federal Building was selected in tribute to the people of Oklahoma City, whose tragedy precipitated the establishment of the Interagency Security Committee in 1995, and to the unparalleled effort of the team that developed the 1995 “Vulnerability Assessment of Federal Facilities” report, establishing the first uniform set of security standards for Federal facilities. The facility symbolizes the rebirth of the Federal presence in Oklahoma City and the unyielding spirit of America, the cherished openness of our society, and the need to be ever vigilant.

Photo courtesy of the U.S. General Services Administration

Photographer: Timothy Hursley

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# Preface



Homeland  
Security



**Robert B. Stephan**  
*Assistant Secretary for  
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Protecting the Federal employees and private citizens who visit U.S. government-owned or leased facilities from all hazards is a complex and challenging responsibility. It is also one of our top national priorities and the mission of the Interagency Security Committee (ISC).

As Chair of the ISC, I am pleased to introduce the new ISC Standard entitled, *Facility Security Level Determinations for Federal Facilities: An Interagency Security Committee Standard*. The Standard defines the criteria and process a facility should use to determine its facility security level (FSL), and serves as the basis for implementing protective measures. The facility security level determination directs agency security officials to a set of baseline standards that may be customized to address site-specific threat conditions.

This new Standard supersedes all previous ISC guidance on establishing FSLs as well as the 1995 Department of Justice report, "Vulnerability Assessment of Federal Facilities." Consistent with Executive Order 12977 (October 19, 1995), this Standard applies to all buildings and facilities in the United States occupied by Federal employees for nonmilitary activities. These include facilities that are government-owned, leased, to be constructed, modernized, or purchased.

Any facility entering the inventory on or after the date of issuance (March 10, 2008) shall have an FSL designation made in accordance with this Standard. All Federal facilities that were in the inventory prior to March 10, 2008, must have a new FSL determination completed by September 30, 2009. This new FSL determination may be completed as part of — or independent from — a full security assessment.

The Standard is a significant milestone and represents exemplary collaboration within the ISC working group and across the entire ISC. ISC members approved the Standard with full concurrence and will review and update this Standard as needed.

A handwritten signature in black ink that reads "Robert B. Stephan".

Robert B. Stephan  
*Assistant Secretary for Infrastructure Protection*

# 1. Background

On April 20, 1995, the day after the bombing of the Alfred P. Murrah Building in Oklahoma City, Oklahoma, the President directed the U.S. Department of Justice (DOJ) to assess the vulnerability of Federal office facilities to terrorism and other acts of violence. On June 28, 1995, DOJ issued the “Vulnerability Assessment of Federal Facilities” report (1995 Report) establishing Governmentwide facility security standards. The 1995 Report laid the foundation for all subsequent Interagency Security Committee (ISC) security standards documents. It also contained criteria for categorizing Federal office facilities into five security levels, with the number of Federal employees housed and the size of the facility being prominent criteria. The ISC relied on those same criteria for designating security levels in all subsequent documents.

In 2006, the ISC members agreed to update and coordinate all ISC standards published to date and consolidate them into one compendium. Since this issue had not been addressed since 1995, the first step was to review and update the standards for existing facilities as set forth in the 1995 Report. The ISC established the Existing Facilities Security Standards Working Group to accomplish that task. The working group determined that the process for designating a facility’s security level needed updating, particularly in light of the increased threat made apparent by the terrorist attacks of September 11, 2001.

# 2. Applicability and Scope

“Facility Security Level Determinations for Federal Facilities—An Interagency Security Committee Standard” (the Standard) defines the criteria and process to be used in determining the facility security level (FSL) of a Federal facility, a categorization which then serves as the basis for implementing protective measures under other ISC standards. Consistent with the authority contained in Executive Order 12977, “Interagency Security Committee,” dated October 19, 1995, this Standard is applicable to all buildings and facilities in the United States occupied by Federal employees for nonmilitary activities. These include existing buildings, new construction, or major modernizations; facilities owned, to be purchased, or leased; stand-alone facilities, Federal campuses, and, where appropriate, individual facilities on Federal campuses; and special-use facilities.

Critical infrastructure such as dams, tunnels, bridges, national monuments, or similar structures are not normally considered to be Federal facilities as defined in this document; they are generally identified as “high-risk symbolic or critical infrastructure” or by other designations as determined by the departments or agencies responsible for their protection, in accordance with guidance provided under the National Infrastructure Protection Plan. While this Standard was not written with application to these structures in mind, the methodology upon which it is based is applicable.

This Standard supersedes all previous guidance on establishing FSLs contained in the 1995 Report or other ISC Standards. To keep pace with the dynamic nature of the threat to Federal facilities, the ISC will review this document on a recurring basis and update it as necessary.

### 3. Definitions

**Building Security Committee:** A committee consisting of representatives of all Federal tenants in the facility, generally responsible for identifying building-specific security issues and approving the implementation of security measures and practices. In the case of new construction or pending lease actions, the Building Security Committee may consist of the design team and planned tenants.

**Campus:** Two or more Federal facilities located contiguous to one another and typically sharing some aspects of the environment, such as parking, courtyards, private vehicle access roads, or gates and entrances to connected facilities. A campus may also be referred to as a “Federal center” or “complex.”

**Designated Official:** The highest ranking official of the primary tenant agency of a Federal facility or, alternatively, a designee selected by mutual agreement of tenant agency officials. For facilities owned and leased by the U.S. General Services Administration (GSA), the definition appears in Title 41, Section 102-71.20, of the *Code of Federal Regulations* (41 CFR 102-71.20).

**Essential Functions:** Government functions that enable Federal Executive Branch agencies to provide vital services, exercise civil authority, maintain the safety and well-being of the general populace, and sustain the industrial/economic base in an emergency.

**Facility Security Level:** A categorization based on the analysis of several security-related facility factors, which then serves as the basis for the implementation of certain protective security measures specified in other ISC standards.

**Federal Departments and Agencies:** Those executive departments enumerated in 5 U.S.C. 101, and the U.S. Department of Homeland Security (DHS); independent establishments as defined by 5 U.S.C. 104(1); Government corporations as defined by 5 U.S.C. 103(1); and the United States Postal Service.

**Federal Facilities:** Leased and owned buildings and facilities in the United States (inclusive of its territories) occupied by Federal Executive Branch employees for nonmilitary activities.

**Mixed-Tenant Facility:** A facility that includes one Federal tenant as well as non-Federal tenants, including commercial and State/local government tenants.

**Mixed-Multi-Tenant Facility:** A facility that includes tenants from multiple Federal departments and agencies as well as one or more non-Federal tenants.

**Multi-Tenant Facility:** A facility that includes tenants from multiple Federal departments and agencies but no non-Federal tenants.

**National Essential Functions (NEFs):** That subset of essential functions that are necessary to lead and sustain the Nation during a catastrophic emergency and that, therefore, must be supported through the Continuity of Operations (COOP) and the Continuity of Government (COG) capabilities.

**Primary Mission Essential Functions:** Those essential functions that must be performed to support or implement the performance of NEFs before, during, and in the aftermath of an emergency.

**Security Organization:** The Government agency or an internal agency component responsible for physical security at the specific facility (e.g., the DHS Federal Protective Service, the United States Marshals Service, the U.S. Environmental Protection Agency's Security Management Division).

**Single-Tenant Facility:** A facility that only includes one Federal tenant, or multiple components of the same Federal department or agency that fall under one "umbrella" for security purposes.

**Special-Use Facilities:** An entire facility or space within a facility itself that contains environments, equipment, or data normally not housed in typical office, storage, or public access facilities. Examples of special-use facilities include, but are not limited to, high-security laboratories, hospitals, aircraft and spacecraft hangers, or unique storage facilities designed specifically for such things as chemicals and explosives.

## 4. Making the Facility Security Level Determination

The initial FSL determination for new leased or owned space will be made as soon as practical after the identification of a space requirement (including succeeding leases). The determination should be made early enough in the space acquisition process to allow for the implementation of required countermeasures (or reconsideration of the acquisition caused by an inability to meet minimum physical security requirements).

Risk assessments will be conducted at least every 5 years for Level I and II facilities and at least every 3 years for Level III, IV, and V facilities. The FSL will be reviewed and adjusted, if necessary, as part of each initial and recurring risk assessment.

The responsibility for making the final FSL determination rests with the tenant(s), who must either accept the risk or fund security measures to reduce the risk:

- For single-tenant Government-owned or -leased facilities, a representative of the tenant agency<sup>1</sup> will make the FSL determination, in consultation with the owning or leasing department or agency and the security organization(s) responsible for the facility.
- In multi-tenant Government-owned or -leased facilities, the Designated Official (in coordination with a representative of each Federal tenant (i.e., the Building Security Committee)) will make the FSL determination, in consultation with the owning or leasing department or agency and the security organization(s) responsible for the facility.

When the security organization(s) and the owner/leasing authority do not agree with the tenant agency representative or Designated Official with regard to the FSL determination, the ISC, as the representative of the Secretary of Homeland Security, will facilitate the final determination.

The FSL determination should be documented, signed, and retained by all parties to the decision.

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<sup>1</sup> The representative of the tenant agency may be the Designated Official or another official approved by the department or agency to make such determinations (e.g., the Director of Security might make all determinations to ensure consistency).

## 5. Basis for the Factors and Criteria

To establish the FSL, it is important to consider factors that make the facility a target for adversarial acts (threats), as well as those that characterize the value or criticality of the facility (consequences). The 1995 Report identified a number of factors to consider in determining a facility's security level. However, size and population were the only two clearly defined criteria attributable to establishing a security level; accordingly, their impact in many cases was disproportionate. The 1995 Report identified other factors, including the degree of public contact, the type of activities carried out (mission), and the type of agencies located in the facility, but it provided only limited guidance for applying those factors. In many cases, a single facility had features that met criteria of multiple security levels outlined in the 1995 Report, making it difficult to categorize. This Standard takes into account size and population, as well as several other factors that determine the "value" of the facility to the Government and to potential adversaries.

Just as the criteria established in the 1995 Report were largely based on terrorist targeting as it was understood in 1995, the criteria incorporated in this new methodology are based upon an analysis of terrorist targeting as it is understood today and the assessed objectives of terrorists as stated in Homeland Security Presidential Directive 7 (HSPD-7)<sup>2</sup>:

Terrorists seek to destroy, incapacitate, or exploit critical infrastructure and key resources across the United States to threaten national security, cause mass casualties, weaken our economy, and damage public morale and confidence.

HSPD-7 went on to establish national policy identifying the specific consequences against which the Nation's key resources (including Government facilities) must be protected.

In 2007, HSPD-20<sup>3</sup> identified eight NEFs—fundamental activities that the Federal Government should be able to carry out at any point, including during a major disaster. The continuity of these fundamental activities, as well as primary mission essential functions and other essential functions, are a part of determining the "value" of a facility to the Government.

Finally, the threat to our facilities from criminal elements must also be evaluated in determining the FSL. Consideration must be given to the risk from more common criminal acts, such as theft, assault, unlawful demonstrations, workplace violence, and vandalism—acts which historically occur more frequently at Federal facilities than acts of terrorism.

These concepts have been incorporated into determining the factors and criteria established in this Standard.

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<sup>2</sup> Homeland Security Presidential Directive 7, "Critical Infrastructure Identification, Prioritization, and Protection," dated December 17, 2003

<sup>3</sup> Homeland Security Presidential Directive 20, "National Continuity Policy," dated May 9, 2007



## 6. Facility Security Level Matrix

The FSL matrix uses five equally weighted security factors to be evaluated, with corresponding points of 1, 2, 3, or 4 allocated for each factor. The sections that follow provide the criteria to be used in evaluating each factor and assigning points. However, the criteria cannot capture all of the circumstances that could be encountered. Thus, the Standard includes a sixth factor—intangibles—to allow the assessor to consider other factors unique to the department/agency needs or to the facility.

Additionally, although the requirement for assessment-specific judgment has been reduced to the extent possible, it may still be necessary. To that end, this document includes an explanation of why each factor was included, a description of its intended impact on the score, and examples to allow security professionals encountering conditions that do not clearly match those anticipated here to make an informed decision based on the same rationale used in the development of this process.

To use the FSL matrix, each of the factors will be examined and a point value assigned based on the scoring criteria provided. The points for all factors will then be added together and a preliminary FSL identified, based on the sum. The assessor may then consider any intangibles that may be associated with the facility. An adjustment to the FSL may be made (and documented) accordingly, and a final FSL determined.

### ISC Facility Security Level Determination Matrix

Factor	Points				Score
	1	2	3	4	
Mission Criticality	LOW	MEDIUM	HIGH	VERY HIGH	
Symbolism	LOW	MEDIUM	HIGH	VERY HIGH	
Facility Population	< 100	101-250	251-750	> 750	
Facility Size	< 10,000 sq. ft.	10,001-100,000 sq. ft.	100,001-250,000 sq. ft.	> 250,000 sq. ft.	
Threat to Tenant Agencies	LOW	MEDIUM	HIGH	VERY HIGH	
					Sum of above
Facility Security Level	<b>I</b> 5-7 Points	<b>II</b> 8-12 Points	<b>III</b> 13-17 Points	<b>IV</b> 18-20 Points	Preliminary FSL
Intangible Adjustment	Justification				+ / - 1 FSL
					Final FSL

## 7. Facility Security Level Scoring Criteria

### 7.1. Mission Criticality

The value of a facility to the Government is based largely on the mission of the facility, particularly as it may relate to NEFs and other important business of the Government. As vital as it is for the Government to perform these activities, it is equally attractive to adversaries to disrupt important Government missions. The mission criticality score is based on the criticality of the missions carried out by tenants in the facility (not by the tenant agencies overall). In a multi-tenant or mixed-multi-tenant facility, the highest rating for any tenant in the facility should be used for this factor. COG and COOP documents are good sources of information regarding the performance of essential functions.

**Table 1 - Mission Criticality**

Value	Points	Criteria	Examples
Very High	4	National leadership, seats of constitutional branches. Houses chief officials for a branch of Government.	White House
		Communications centers that support national essential Government functions.	White House Communications Agency facilities
		Houses essential communications equipment necessary for defense or intelligence activities.	Intelligence community facilities, including communications and weapons/munitions storage
		Houses individuals necessary to advance American interests with foreign governments.	U.S. Department of State headquarters
		Houses government officials of foreign nations.	Foreign embassies and consulates in the United States
		Houses individuals or specialized equipment necessary to identify and analyze threats to homeland security.	U.S. Coast Guard, ports of entry, agencies engaged in counterterrorism or counternarcotics
		Houses personnel or specialized equipment necessary to identify or respond to large-scale or unique incidents.	Emergency operations centers, national response assets (e.g., Nuclear Emergency Support Teams)
		Houses personnel or specialized equipment essential to regulating national fiscal or monetary policy, financial markets, or other economic functions.	U.S. Department of Commerce building
		Contains currency, precious metals, or other material necessary to maintain economic stability.	U.S. Mint facilities, Federal Reserve buildings
		Houses specialized equipment necessary to process or monitor financial transactions necessary for the Nation's economy.	National financial centers
		Houses personnel or specialized equipment necessary to detect or respond to unique public health incidents.	Centers for Disease Control and Prevention
		Houses material or information that, if compromised, could cause a significant loss of life., including production quantities of chemicals, biohazards, explosives, weapons, etc	U.S. Department of Energy research reactor facilities, explosives storage facilities
		COG facilities.	FEMA Emergency Operations Center

**Table 1 – Mission Criticality (Continued)**

Value	Points	Criteria	Examples
High	3	Original, irreplaceable material or information central to the daily conduct of Government.	National Archives
		Designated as a shelter in the event of an emergency incident.	Smithsonian museums
		Regional or headquarters policy and management oversight.	GSA National Capitol Region Headquarters, Social Security Administration Headquarters
		Biological/chemical/radiological/medical research or storage of research and development (de minimis) quantities of chemicals, biohazards, explosives, and similar items.	Plum Island Animal Disease Research Center
		COOP facilities for department and agency headquarters.	GSA Central Office COOP facility
		General criminal investigative work.	Fraud, financial, non-terrorism-related crime
		Judicial processes.	Federal courts
Medium	2	District or State-wide service or regulatory operations.	Agriculture Food Safety and Inspection Services District Office
		COOP facilities for other than national headquarters.	GSA Regional Office COOP site
Low	1	Administrative, direct service, or regulatory activities at a local level.	Agricultural County Extension Office

## 7.2. Symbolism

The symbolism of the facility is based on both its attractiveness as a target and the consequences of an event. The symbolic value is first based on external appearances or well-known/publicized operations within the facility that indicate it is a U.S. Government facility. Transnational terrorists often seek to strike at symbols of the United States, democracy, and capitalism. Domestic radicals may seek to make a statement against Government control, taxation, or regulation.

Symbolism is also important because of the potential negative psychological impact of an undesirable event occurring at a prominent Federal facility. Attacks at certain Government facilities, particularly those that are perceived to be well-protected and central to the safety and well-being of the United States, could result in a loss of confidence in the U.S. Government domestically or internationally.

It is also necessary to recognize that even if there are no external appearances or well-known operations of the U.S. Government, a mixed-tenant or mixed-multi-tenant facility may be symbolic to terrorists with other motivations. For example, facilities such as financial institutions, communications centers, transportation hubs, and controversial testing laboratories may be symbolic in the eyes of single-interest radicals and international terrorist organizations, whose leaders have stated that strikes against the American economy are a high priority. The symbolism of non-U.S. Department of Defense (DOD) Federal facilities on a DOD campus should be assessed similarly.

**Table 2 - Symbolism**

Value	Points	Criteria	Examples
<b>Very High</b>	<b>4</b>	Popular destination for tourists.	Smithsonian museums
		A nationally significant historical event has occurred at the facility.	Independence Hall
		Widely recognized to represent the Nation's heritage, tradition, or values.	White House, U.S. Capitol, Supreme Court building
		Contains significant original historical records or unique artifacts that could not be replaced in the event of their damage or destruction.	National Archives, Smithsonian museums
		Executive department headquarters building.	DOJ, U.S. Department of Transportation Headquarters
		Other prominent symbols of U.S. power or authority.	U.S. Circuit, District, or Bankruptcy Courthouses, Central Intelligence Agency Headquarters
<b>High</b>	<b>3</b>	Well-known, regional U.S. Government facility.	Oklahoma City Federal Building
		Agency/bureau headquarters.	GSA Central Office, Environmental Protection Agency Headquarters, Social Security Administration Headquarters
		Located in a symbolic commercial financial building.	International trade centers
		Co-located with other nongovernmental but highly symbolic facilities.	Transportation hubs
<b>Medium</b>	<b>2</b>	Readily identified as a U.S. Government facility based on external features.	Signage stating "Federal Office Building," Great Seal of the United States, seals of departments and agencies on exterior
		Readily identified as a U.S. Government facility based on the nature of public contact or other operations (even without external features).	Social Security Administration field office
		Dominant, single Federal facility in a community or rural area.	U.S. Department of Veterans Affairs clinic
		Nongovernmental commercial laboratory or research facility that may be symbolic to single-interest radicals.	Animal testing facility
<b>Low</b>	<b>1</b>	No external features or public contact readily identifying it as a U.S. Government facility.	Classified locations, small offices in leased commercial buildings

### 7.3. Facility Population

The infliction of mass casualties is an acknowledged goal of many terrorist organizations. Recovered terrorist preoperational surveillance reports include considerable details on the times of day that the target population is at its highest and do not distinguish between tenants and visitors. From a consequence perspective, the potential for mass casualties should be a major consideration.

Thus, the facility population factor is based on the peak total number of personnel in Government space, including employees, onsite contract employees, and visitors. This number should not include such transient influxes in population as an occasional conference (or similar event), unless the facility is intended for use in such a manner (such as a conference center) and the population is part of normal business. Transient shifts in population such as the occasional conference should be addressed by contingency security measures.

The number of daily visitors should be determined using the best metrics available to ensure the most accurate population. Ideally, this would be achieved through a review of visitor logs or access control lists; however, it may necessitate an estimate or a short-term sampling of visitor throughput.

Facilities such as stand-alone parking garages should be considered to have a “population” of less than 100.

The sensitive nature of childcare centers located in Federal facilities requires every Federal childcare center or facility with a childcare center to receive a facility population score of “very high” and a point value of 4.

If the non-Federal population of a mixed-tenant or mixed-multi-tenant facility contributes to the target attractiveness (e.g., creates a substantial population over and above the Federal population), document the rationale and add 1 point, not to exceed the maximum of 4 points.

**Table 3 - Facility Population**

Value	Points	Criteria
Very High	4	Greater than 750 or facilities with childcare centers
High	3	251 to 750
Medium	2	101 to 250
Low	1	Less than 100

## 7.4. Facility Size

The facility size factor is based on the square footage of all Federally-occupied space in the facility, including cases where an agency with real property authority controls some other amount of space in the facility. If the entire facility or entire floors are occupied, gross square footage should be used (length x width); if only portions of floors are occupied in a multi-tenant facility, assignable or rentable square footage should be used.

Size may be directly or indirectly proportional to the facility population. An office facility with a large population will generally have a correspondingly large amount of floor space; however, a large warehouse may have a very small population.

For a terrorist, an attack on a large, recognizable facility results in more extensive press (video) coverage. However, it should also be understood that large facilities require a more substantial attack to create catastrophic damage, entailing more planning and preparation by adversaries, which could be a deterrent.

From a consequence perspective, the cost to replace or repair a large facility is a major consideration. The National Infrastructure Protection Plan considers the cost to rebuild a facility in determining the potential economic impact of a successful attack.

If the total size of a mixed-tenant or mixed-multi-tenant facility beyond that occupied by the Federal population contributes to the target attractiveness (e.g., creates a highly recognizable structure based on size alone), document the rationale and add 1 point, not to exceed the maximum of 4 points.

**Table 4 - Facility Size**

Value	Points	Criteria
Very High	4	Greater than 250,000 square feet
High	3	100,000 to 250,000 square feet
Medium	2	10,000 to 100,000 square feet
Low	1	Up to 10,000 square feet

## 7.5. Threat to Tenant Agencies

Unlike the criticality of mission criterion, which is considered in terms of consequences, the threat to tenant agencies criterion is considered from a perspective of target attractiveness. The facility should be viewed in terms of whether the nature of public contact required in or resulting from the conduct of business is adversarial, or whether there is a history of adversarial acts committed at the facility, against facility tenants, or against the tenant agencies elsewhere.

The highest score applicable to any tenant in a multi-tenant facility will be considered when determining the FSL, even though it may be possible to limit the implementation of countermeasures for that threat to a specific tenant's space or part of the facility.

As with the impact of commercial tenants on the facility's symbolism score, the potential threat to non-Federal tenants in a mixed-tenant or mixed-multi-tenant facility could result in a collateral risk to Federal tenants. Thus, in considering the criteria, the threat to all tenants in a facility—including non-Federal tenants—should be considered and the highest score used for the rating.

**Table 5 - Threat to Tenant Agencies**

Value	Points	Criteria	Examples
Very High	4	Tenant mission and interaction with certain segments of the public is adversarial in nature.	Criminal and bankruptcy courts, high-risk law enforcement, including those who routinely contact or attract the attention of dangerous groups (FBI, DEA, ATF)
		Tenant mission is controversial in nature and routinely draws the attention of organized protest groups.	Environmental Protection Agency, Department of Energy, courthouses World Banks
		Located in a high-crime area.	As determined by a characterization established by local law enforcement
		Significant history of violence directed at or occurring in the facility. More than 10 incidents per year requiring law enforcement/security response for unruly or threatening persons on site.	As determined by security organization or tenant incident records
High	3	Public contact is occasionally adversarial based on the nature of business conducted at the facility.	Non-criminal/administrative courts where privileges or benefits may be suspended or revoked, general law enforcement operations, National Labor Relations Board offices
		History of demonstrations at the facility.	U.S. State Department headquarters
		Located in a moderate-crime area.	As determined by a characterization established by local law enforcement
		History of violence directed at the facility or the occupants; 5–10 incidents per year requiring law enforcement/security response for unruly or threatening persons on site.	As determined by security organization or tenant incident records



**Table 5 – Threat to Tenant Agencies (Continued)**

Value	Points	Criteria	Examples
Medium	2	Generally non-adversarial public contact based on the nature of business conducted at the facility.	General/internal investigations, inspection services for the U.S. Department of Agriculture, Department of State passport office
		History of demonstrations against the tenant agency (not at the facility).	U.S. Nuclear Regulatory Commission, U.S. Citizenship and Immigration Services
		Located in a low-crime area.	As determined by a characterization established by local law enforcement
		History of violence directed at tenant agencies/companies (not at the facility).	Internal Revenue Service, Social Security Administration offices
Low	1	Generally little-to-no public contact.	Government warehouses or storage facilities, Federal Trade Commission
		No history of demonstrations at the facility.	As determined by security organization or tenant incident records
		No history of violence directed at the facility or the occupants.	As determined by security organization or tenant incident records

## 7.6. Intangible factors

It is not possible for this document to take into account all the conditions that may affect the FSL decision for all the different Federal departments and agencies. Certain factors, such as a short duration of occupancy, may reduce the value of the facility in terms of investment or mission, which could justify a reduction of the FSL. Such factors are in essence indicative of a reduced value of the facility itself and a corresponding reduction in the consequences of its loss.

Other factors may suggest an increase in the FSL, such as the potential for cascading effects or downstream impacts on interdependent infrastructure, or costs associated with the reconstitution of the facility.

Accordingly, the FSL may be raised or lowered one level at the discretion of the deciding authority based on intangible factors. However, the intangible factor should not be used to raise or lower the FSL in response to a particular threat act. The FSL characterizes the entire facility; concerns about specific threats should be addressed with specific countermeasures, even if they are over and above those required as the baseline for a particular security level.

Short-term events could also temporarily affect the factors evaluated here. Unless these events happen on a recurring basis, they should not affect the FSL determination. Instead, contingency plans should be developed to implement temporary measures until the event has passed. For example, a weeklong conference may increase the population of a facility substantially during the conference, but it should not be considered in the FSL determination. On the other hand, if the

facility is a conference center that normally holds such gatherings, the population during those conferences should be factored into the FSL.

Like all risk-management decisions, it is important to document these intangible factors and the resulting adjustments made to the FSL score. The decision-making authority should document any intangible factors and the associated adjustment and retain this information as part of the official facility security records.

## 8. Level V Facilities

While the incorporation of additional factors and criteria makes this Standard more useful to determine the FSL for special-use and other unique facilities, such as high-security laboratories, hospitals, or unique storage facilities for chemicals or munitions, some facilities may still not fit neatly into the criteria defined here. The criticality of the mission or the symbolic nature of the facility could be such that it merits a degree of protection above that specified for a FSL Level IV facility, even though the other contributing factors, such as population or square footage, might be scored lower.

For example, a research laboratory might receive lower score values for symbolism, square footage, and population size. However, the laboratory may be responsible for critical research and diagnostic activities that are vital to protecting the Nation's citizenry or animal and food products from disease agents accidentally or deliberately introduced into the United States. This mission, combined with the fact that it may be the only such laboratory in the country, would suggest that the criticality factor would far outweigh lower score values in symbolism, population, and/or facility size, and thus the facility should be considered for a Level V designation. As a result, the criteria and decision-making authority for identifying Level V facilities are within the purview of the individual agency. As general guidance, agencies should consider a facility as potentially suitable for a Level V designation if it receives a "very high" score value for criticality or symbolism and is a one-of-a-kind facility (or nearly so).

## 9. Campuses, Complexes, and Federal Centers

A campus consists of two or more Federal facilities located contiguous to one another and sharing some aspects of the environment (e.g., parking, courtyards, vehicle access roads, or gates) or security features (e.g., a perimeter fence, guard force, or onsite central alarm/closed circuit television monitoring station). It may also be referred to as a "complex" or "Federal center."

In the case of a campus that houses a single tenant, such as the DHS Headquarters campus or the Social Security Administration's headquarters campus, an overall FSL may be established. In multi-tenant campuses, all individual facilities in the campus will either be assigned an FSL in accordance with this Standard, or all tenants may agree to determine an overall FSL for the entire campus, treating the entire campus as though it were a multi-tenant facility (using the highest rating of any tenant in the facility for each factor).

## 10. Changes in the Facility Security Level

Changes in the environment at the facility, particularly when tenants move in or out, could result in changes in the scoring for the various factors. Under the standards set forth in the 1995 Report, a small change to the population (such as an increase from 150 to 151 employees) could result in the change in security level. The use of multiple factors in making the FSL determination somewhat dilutes the effect of any one factor and all but prevents a small change from causing a change in security level. However, the nature of the tenant (i.e., the criticality of the mission or risk associated with the agency itself) moving in or out may also affect the FSL.

It may be impractical to adjust the FSL every time a tenant moves in or out of a multi-tenant facility; instead, the FSL will be reviewed at least as part of the regularly recurring risk assessment and adjusted as necessary. Major changes in the nature of the tenants should merit consideration of whether to review and potentially adjust the FSL between the regularly scheduled assessments.

The requirement for recurring risk assessments may in some cases make the argument for a Federal facility to install or retain temporary perimeter security measures rather than permanent installations, given that the risk may decrease later, particularly if the facility tenant mix is likely to change.

## 11. Co-Location of Tenants with Similar Security Needs

Establishing a FSL that is agreeable to all the tenants in a multi-tenant facility is especially challenging when tenants do not have similar security requirements, such as when a high-risk law enforcement entity is located in the same facility as a low-risk administrative entity.

The 1995 Report stated that the co-location of agencies with varying security needs was a contributing factor to inadequate security in Federal facilities. The report recommended that “GSA should...ensure that functionally similar agencies are housed in the same location.” Furthermore, “[t]o make effective and efficient security arrangements for a given facility, there needs to be greater grouping of agencies with similar risk assessments....”

This remains a significant issue today, and the ISC reaffirms this recommendation: compatible tenants—those with similar security concerns and requirements—should be co-located whenever possible, and incompatible tenants should not. This principle should be applied by all agencies with real property authority, not just GSA.

The factors of mission criticality and threat to tenant agencies should be primary considerations in determining compatible tenants. Additionally, although it is not explicitly considered above, the volume of public contact for various tenants is also a concern, especially where the screening of visitors may become a requirement.

This has traditionally been a difficult issue in smaller communities where there is only one Federal facility. Generally, this results in the co-location of tenants with differing security requirements, which leads agencies with higher security requirements to request separate space where they can be the sole tenants. Although this may come at greater cost, it is a risk-management decision. Locating a high-risk tenant in a separate facility reduces the threat to the other tenants, reduces the cost of security to all but the tenant that requires it, and ensures that the high-risk tenant can achieve the higher security posture it merits.

A tenant requiring a higher level of security should not be moved into a facility with a low security level. Such a move would result in either the higher-risk tenant accepting less security than it requires, or the lower-risk tenants having to accept and share the cost of a higher level of security than they require. Even if an alternative is to allow the higher-risk tenant to pay for any increased security measures required, based on its move into the facility, the operational impacts upon the other agencies have to be considered (e.g., the implementation of extensive visitor screening procedures may adversely affect a tenant with a high volume of public contact).

The onus is not just on the agency with real property authority that facilitates the relocation; it is shared by agencies seeking to relocate. By agreeing to occupy a space, the agency is agreeing to the level of security established for that facility and any operational or cost impacts associated with maintaining it.

## 12. References

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